

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF ALABAMA

IN RE: ) CHAPTER 13  
SADE LEWIS )  
Debtor(s). ) CASE NO. 16-32691-DHW-13  
)

OBJECTION TO CONFIRMATION

Now comes J.L. LANE LENDING LLC, by its attorneys, Chambless Math ❖ Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof states as follows:

1. This creditor has filed Court Claim #2 in the amount \$47,334.74 which is secured by a 1<sup>ST</sup> MORTGAGE ON REAL ESTATE PROPERTY COMMONLY KNOWN AS 1601 CELINE PLACE MONTGOMERY, AL 36110. Included in the proof of claim is the pre-petition arrears amount of \$6,411.04.

2. This creditor has filed Court Claim #3 in the amount \$11,510.00 which is secured by a 2<sup>ND</sup> MORTGAGE ON REAL ESTATE PROPERTY COMMONLY KNOWN AS 1601 CELINE PLACE MONTGOMERY, AL 36110. Included in the proof of claim is the pre-petition arrears amount of \$1,470.00.

3. The plan fails to provide for the secured claim of this creditor as required by 11 U.S.C. Section 1325(a)(5). The plan fails to make a secured provision for Court Claim #3.

4. The plan is not feasible. The specified payment for this Creditor is insufficient to cure the pre-petition arrears contained in Court Claim #2.

WHEREFORE, J.L. LANE LENDING LLC, prays for an Order denying confirmation along with such further relief as the Court may deem proper.

J.L. LANE LENDING LLC

By: /s/ Leonard N. Math

Of Counsel:  
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this November 12, 2016.

SABRINA L. MCKINNEY  
Chapter 13 Trustee  
PO BOX 173  
MONTGOMERY AL 36101

RICHARD D SHINBAUM  
SHINBAUM & CAMPBELL  
P.O. BOX 201  
MONTGOMERY AL 36101

SADE LEWIS  
1601 CELINA PLACE  
MONTGOMERY AL 36110

/s/ Leonard N. Math